

ORIGINAL  
RECEIVED

AUG 20 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of )  
)  
Revision of the Commission's Rules )  
To Ensure Compatibility with )  
Enhanced 911 Emergency Calling Systems )

CC Docket No. 94-102  
RM-8143

To: Chief, Land Mobile Branch  
Licensing Division  
Wireless Telecommunications Bureau

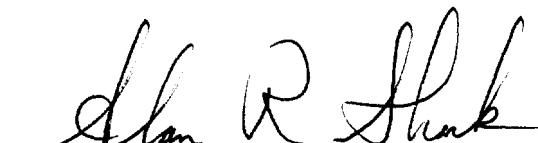
DOCKET FILE COPY ORIGINAL

MOTION FOR EXTENSION OF TIME

Respectfully submitted,

AMERICAN MOBILE TELECOMMUNICATIONS  
ASSOCIATION, INC.

By:



Alan R. Shark, President  
1150 18th Street, N.W., Suite 250  
Washington, D.C. 20036

Of Counsel:

Elizabeth R. Sachs, Esq.  
Lukas, McGowan, Nace & Gutierrez  
1111 Nineteenth Street, N.W. - 12th Floor  
Washington, D.C. 20036  
(202) 857-3500

August 20, 1996

No. of Copies rec'd 0 + 9  
List ABCDE

1. The American Mobile Telecommunications Association, Inc. ("AMTA" or "Association"), in accordance with Section 1.46(b) of the Federal Communications Commission ("FCC" or "Commission") Rules and Regulations, respectfully requests that the Commission extend the period of time for filing Comments and Reply Comments on the Further Notice of Proposed Rule Making in the above-identified proceeding.<sup>1</sup> The Association asks that the Comment period be extended by ninety (90) days and the Reply Comments by one hundred and twenty (120) days to allow all interested parties sufficient time to respond to the complex technical and operational issues raised in the FNPRM and in the Comments of other parties.

2. The Commission already has taken the first steps toward the important public policy goal of improving both the quality and reliability of 911 services available to the customers of wireless telecommunications service providers in the accompanying Report and Order in this proceeding.<sup>2</sup> It already has established an aggressive schedule for implementing a series of 911 and E911 requirements over the next five years. The FNPRM seeks to develop yet a more extensive record focusing on the issue of whether the standards and requirements adopted in the R&O can be expanded. The Commission specifically has requested detailed technical information that will enable it to determine whether even more precise location information can be provided to Public Safety Answering Points ("PSAPs"), whether it will be possible to establish standards governing the speed at which such information must be delivered,

---

<sup>1</sup> 47 C.F.R. § 1.46(b); Further Notice of Proposed Rulemaking, CC Docket No. 94-102, 11 FCC Rcd \_\_\_\_ (rel. July 26, 1996).

<sup>2</sup> Report and Order, CC Docket No. 94-102, 11 FCC Rcd \_\_\_\_ (Rel. July 26, 1996).

and the extent to which the information must be monitored and updated by the carrier to ensure its accuracy. FNPRM at ¶ 134.

3. The issues raised in the FNPRM are complex; they will require extensive, thoughtful consideration by appropriate technical and operational experts. While the FCC's policy objectives are relatively clear -- PSAPs should have access to the most accurate and timely information regarding emergency calls that can be provided at a cost the public is willing to bear -- their implementation in the real world mobile environment may be more problematic. It is imperative that the FCC provide adequate time for the necessary parties to consider how and at what cost the industry might achieve the level of reliability and timelines suggested by the Commission.

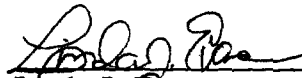
4. AMTA does not believe that an adequate, useful record could be developed in the time currently provided. Therefore, the Association urges the FCC to extend the Comment date by ninety (90) days to November 25, 1996 and the Reply Comment date by one hundred and twenty (120) days to January 10, 1997.

**CERTIFICATE OF SERVICE**

I, Linda J. Evans, a secretary in the law office of Lukas, McGowan, Nace & Gutierrez, hereby certify that I have, on this 20th day of August, 1996, caused to be mailed a copy of the foregoing Motion for Extension of Time to the following:

- \* Chairman Reed E. Hundt  
Federal Communications Commission  
1919 M Street, N.W., Room 814  
Washington, D.C. 20554
- \* Commissioner James H. Quello  
Federal Communications commission  
1919 M Street, N.W., Room 802  
Washington, D.C. 20054
- \* Commissioner Rachelle B. Chong  
Federal Communications Commission  
1919 M Street, N.W., Room 844  
Washington, D.C. 20554
- \* Commissioner Susan Ness  
Federal Communications Commission  
1919 M Street, N.W., Room 832  
Washington, D.C. 20054
- \* Michelle Farquhar, Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 5002  
Washington, D.C. 20554
- \* Gerald Vaughan, Deputy Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 5002  
Washington, D.C. 20554
- \* Rosalind K. Allen, Deputy Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 5002  
Washington, D.C. 20554

- \* Jennifer Warren, Associate Bureau Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 5002  
Washington, D.C. 20554
- \* David Furth, Chief  
Commercial Wireless Division  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 7002  
Washington, D.C. 20554
- \* Sandra Danner, Chief  
Legal Branch  
Commercial Wireless Division  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 7130-H  
Washington, D.C. 20554
- \* Terry L. Fishel, Chief  
Land Mobile Branch  
Division of Operations  
Wireless Telecommunications Bureau  
Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325
- Emmett B. Kitchen  
President  
PCIA  
500 Montgomery Street  
Suite 700  
Alexandria, VA 22314

  
Linda J. Evans

\*Via Hand Delivery